

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

GERALD P. CZUBA, both individually
and on behalf of a class of others
similarly situated,

Plaintiff,

v.

IKO MANUFACTURE, INC.,

Defendants.

Case No. 09-cv-0409

**MOTION FOR ADMISSION
TO PRACTICE PRO HAC VICE**

PLEASE TAKE NOTICE that pursuant to Local Rule Civil 83.1, *et seq.*, of the United States Western District Court for the District of the New York, Charles J. LaDuca, a New York Bar Member and a Member of the Western District of New York Court with the Law Office of Cuneo Gilbert & LaDuca, LLP hereby requests the entry of an Order admitting Brendan S. Thompson, of Cuneo Gilbert & LaDuca, LLP, to practice before this Court in this matter Pro Hac Vice, on behalf of Plaintiff Gerald P. Czuba.

PLEASE TAKE FURTHER NOTICE that my Affidavit and Brendan S. Thompson's Declaration in support of the application, are submitted with this notice of motion.

PLEASE TAKE FURTHER NOTICE that a form of order on this application is submitted with this notice of motion.

Cuneo Gilbert & LaDuca, LLP

By: /s/ Charles J. LaDuca

Date: May 7, 2009

Charles J. LaDuca, Bar #3975927
CUNEO GILBERT & LADUCA, LLP
507 C Street, N.E.
Washington, DC 20002
(202) 789-3960

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IKO MANUFACTURE, INC.,

Defendants.

Case No. 09-cv-0409

**AFFIDAVIT OF CHARLES
J. LADUCA IN SUPPORT OF
BRENDAN S. THOMPSON'S
PRO HAC VICE ADMISSION**

Charles J. LaDuca, being first duly sworn, deposes and states upon personal knowledge and information as follows:

1. I am counsel for the Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Brendan S.

Thompson as counsel pro hac vice to represent the Plaintiff in this matter.

2. I am a member of the New York and District of Columbia Bars. I was initially admitted to the New York Bar in 2001. In addition, I was admitted to practice in this District on August 9, 2005. I am also admitted to practice in the U.S. Court of Appeals for the Third Circuit; U.S. District Courts for the District of Columbia, Northern District of New York, District of Minnesota, and the District of Colorado.

3. Brendan S. Thompson is employed as an associate of Cuneo Gilbert & LaDuca, LLP, where I am a Partner. I have worked with him since 1997.

4. I have found Brendan S. Thompson to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to support and respectfully move for the admission of Brendan S. Thompson, pro hac vice.

6. I respectfully submit a proposed order granting the admission of Brendan S. Thompson pro hac vice in this case.

I hereby declare, under penalty of perjury, that the foregoing is true and correct, based on my personal knowledge and information.

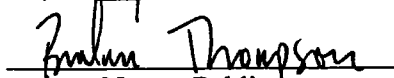
Dated: May 6, 2009



Charles J. LaDuca, Esq.
CUNEO GILBERT & LADUCA, LLP
507 C Street, N.E.
Washington, DC 20002
(202) 789-3960

District of Columbia SS:

Subscribed and sworn before me this 6th
Day of May, 2009.


Notary Public

Brendan S. Thompson
Notary Public, District of Columbia
My Commission Expires 4/14/2012

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Case No. 09-cv-0409

**DECLARATION OF BRENDAN
S. THOMPSON IN SUPPORT
OF THE MOTION FOR
ADMISSION PRO HAC VICE**

Brendan S. Thompson, being first duly sworn, deposes and states upon personal knowledge and information as follows:

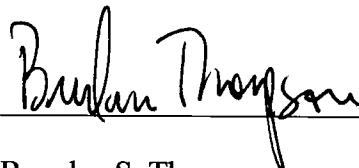
1. I am an attorney licensed in the State of Maryland, where I was admitted in 2008. I am also admitted to practice in United States District Court for the District of Colorado.
2. I am employed as an associate at the law firm of Cuneo Gilbert & LaDuca, LLP, where I work on complex class actions.
3. I have been retained by Gerald P. Czuba, the Plaintiff in this case, to advise and represent him in the above-captioned litigation. I make this declaration in support of the attached motion for my admission to practice before this Court *pro hac vice*.
4. I am a member in good standing in each of the court systems set forth above. I have never been held in contempt of court, censured in a disciplinary

proceeding or suspended or disbarred.

5. I have been requested by Gerald P. Czuba to represent him in this matter. My admission will serve the interests of Gerald P. Czuba, and the class of individuals they seek to represent, and will facilitate the efficient handling of this matter.

I hereby declare, under penalty of perjury, that the foregoing is true and correct, based on my personal knowledge and information. .

Dated: May 7, 2009

A handwritten signature in black ink, reading "Brendan Thompson", is written over a horizontal line.

Brendan S. Thompson
CUNEO GILBERT & LADUCA, LLP
507 C Street, N.E.
Washington, DC 20002
(202) 789-3960

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ATTORNEY'S OATH

STATE OF Dist of Columbia)
) SS:
_____ COUNTY)

I, Brendan S. Thompson Conco Gilbert & La Duen, LLP, 507 C St, NE
of Washington, DC 20002
City, State

do solemnly swear or affirm that I will demean myself, as an attorney and counselor of the United
States District Court for the Western District of New York, uprightly and accordingly to law; and I will
support the Constitution of the United States. So help me God.

Brendan Thompson
Signature of Attorney

Subscribed and sworn to before me this 6
day of May, 2009.

Mary F. Vincent
Notary Public

MARY F. VINCENT
Notary Public, District of Columbia
My Commission Expires March 31, 2013

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

APPENDIX TO CIVILITY PRINCIPLES

OATH OF OFFICE

I do solemnly swear (or affirm):

I will support the Constitution of the United States and the Constitution of the State of New York;

I will maintain the respect due to Courts of Justice and judicial officers;

I will not counsel or maintain any suit or proceeding which shall appear to me to be unjust nor any defense except such as I believe to be honestly debatable under the law of the land;

I will employ for the purpose of maintaining the causes confided to me such means only as are consistent with truth and honor and will never seek to mislead the judge or jury by an artifice or false statement of fact or law;

I will maintain the confidence and preserve inviolate the secrets of my client and will accept no compensation in connection with his business except from him or with his knowledge and approval;

I will abstain from all offensive personality and advance no fact prejudicial to the honor or reputation of a party or witness unless required by the justice of the cause with which I am charged;

I will in all other respects conduct myself personally and professionally in conformity with the high standards of conduct imposed on members of the bar as conditions for the privilege to practice law in this State and before this Court.

Brendan Thompson

UNITED STATES DISTRICT COURT
Western District of New York

ELECTRONIC CASE FILING SYSTEM REGISTRATION FORM

This form is used to register for an account on the Courts' Case Management/Electronic Files (CM/ECF) system. Registered attorneys will have privileges to electronically submit and to view the electronic docket sheets and documents. By registering, attorneys consent to receiving electronic notice of filings through the system. The following information is required for registration:

PLEASE TYPE

First/Middle/Last Name: Brendan Stephen Thompson

Firm Name: Cuneo Gilbert & LaDuca, LLP

Firm Address: 507 C Street, NE

City/State/Zip: Washington, DC 20002

Voice Phone Number: (202) 789-3960 FAX Number: (202) 789-1813

Internet E-Mail Address: brendant@cuneolaw.com

Additional E-Mail Address
(optional): squinn@cuneolaw.com

Does your E-Mail Software support HTML messages? Yes ☒ No ☐

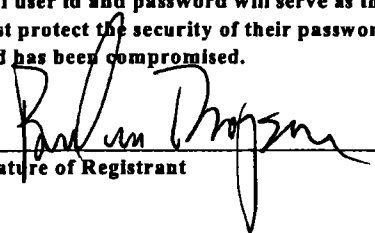
Attorneys seeking to file documents electronically must be admitted to practice in the
United States District Court for the Western District of New York

Date admitted to practice in this Court: pending

If admitted pro hac vice:

Date motion for pro hac vice granted: pending in case number: 09-cv-409

By submitting this registration form, the undersigned agrees to abide by all Court rules, orders and policies and procedures governing the use of the electronic filing system. The undersigned also consents to receiving notice of filings pursuant to Fed. R. Civ. P. 5(b) and 77(d) via the Court's electronic filing system. The combination of user id and password will serve as the signature of the attorney filing the documents. Attorneys must protect the security of their passwords and immediately notify the court if they learn that their password has been compromised.


Signature of Registrant

5/6/2009

Date

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[PROPOSED] ORDER GRANTING PRO HAC VICE

THIS MATTER, having come before the Court on the Motion for Admission to Practice Pro Hac Vice as to Brendan S. Thompson, and the Court being fully advised in the premises, hereby ORDERS that Brendan S. Thompson is admitted pro hac vice.

IT IS SO ORDERED.

Signed on this ____ day of May, 2009.

UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the attached Pro Hac Vice applications to be filed electronically on the Court's ECF filing system.

Date: May 7, 2009

/s/ Charles J. LaDuca

By: Charles J. LaDuca